

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors.¹

PROMESA Title III
Case No. 17-BK-3283-LTS
(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III
Case No. 17-BK-4780-LTS

**INFORMATIVE MOTION OF THE PREPA AD HOC GROUP REGARDING
MARCH 19-20, 2025 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747).

Pursuant to the Court's *Order Regarding Procedures for Hearing on March 19-20, 2025, Omnibus Hearing* (Case No. 17-BK-3283 [ECF No. 28912]) (the "**Order**"), the PREPA Ad Hoc Group² respectfully states as follows:

1. G. Eric Brunstad Jr. and Stephen D. Zide of Dechert LLP ("**Dechert**"), and Richard J. Schell of Monserrate Simonet & Gierbolini, LLC, as co-counsel for the PREPA Ad Hoc Group, will appear at the March 19-20, 2025 omnibus hearing (the "**Hearing**") in person in the Hato Rey Courtroom.

2. David A. Herman and/or Isaac D. Stevens of Dechert, counsel to the PREPA Ad Hoc Group, will appear at the Hearing in-person in the New York Courtroom.

3. Counsel to the PREPA Ad Hoc Group reserve the right to be heard and present argument by any of the above-mentioned counsel on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III cases to the extent that they impact the interests of the PREPA Ad Hoc Group or its members in these Title III cases.

4. Counsel to the PREPA Ad Hoc Group also reserve the right to amend this motion to substitute any of the attorneys herein mentioned for any others who have entered an appearance on behalf of the PREPA Ad Hoc Group in the event of any unforeseen events or circumstances.

5. The Party Appearance Sheet is attached hereto as **Exhibit A**, and the Party Exhibit Cover Sheet is attached hereto as **Exhibit B**.

² The members of the PREPA Ad Hoc Group are listed in the *Fifth Verified Statement of the PREPA Ad Hoc Group pursuant to Bankruptcy Rule 2019*, ECF No. 5446, filed in *In re Fin. Oversight & Mgmt. Bd. for Puerto Rico*, Case No. 17-BK-04780-LTS (D.P.R. Dec. 10, 2024).

We hereby certify that, on this same date, we electronically filed the foregoing with the clerk of the Court using the CM/ECF system, which will notify the attorneys of record.

Dated: San Juan, Puerto Rico
March 12, 2025

Respectfully submitted,

**MONSERRATE SIMONET &
GIERBOLINI, LLC**

/s/ Dora L. Monserrate-Peñagaricano

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** Admitted Pro Hac Vice*

Counsel for the PREPA Ad Hoc Group

Exhibit A
Party Appearance Sheet

<u>Name of Party</u>		<u>Counsel to the PREPA Ad Hoc Group</u>
Attorney 1	Appearance Method	In Person Hato Rey Courtroom
	Name	G. Eric Brunstad, Jr.
	Law Firm	Dechert LLP
	Email	eric.brunstad@dechert.com
	Phone Number	(860) 524-3960
	Docket Entry No. of Order Allowing Pro Hac Vice Appearance	ECF No. 25245 Case No. 17-BK-3283
Attorney 2	Appearance Method	In Person Hato Rey Courtroom
	Name	Stephen D. Zide
	Law Firm	Dechert LLP
	Email	stephen.zide@dechert.com
	Phone Number	(212) 698-3629
	Docket Entry No. of Order Allowing Pro Hac Vice Appearance	ECF No. 25245 Case No. 17-BK-3283
Attorney 3	Appearance Method	In Person New York Courtroom
	Name	David A. Herman
	Law Firm	Dechert LLP
	Email	david.herman@dechert.com
	Phone Number	(212) 649-8728
	Docket Entry No. of Order Allowing Pro Hac Vice Appearance	ECF No. 25245 Case No. 17-BK-3283
Attorney 4	Appearance Method	In Person New York Courtroom
	Name	Isaac D. Stevens
	Law Firm	Dechert LLP
	Email	isaac.stevens@dechert.com
	Phone Number	(215) 698-3876
	Docket Entry No. of Order Allowing Pro Hac Vice Appearance	ECF No. 25511 Case No. 17-BK-03283
Attorney 5	Appearance Method	In Person Hato Rey Courtroom
	Name	Richard J. Schell
	Law Firm	Monserate Simonet & Gierbolini, LLC
	Email	rschell@msglawpr.com
	Phone Number	(787) 620-5300
	Docket Entry No. of Notice of Appearance	ECF No. 25422 Case No. 17-BK-03283

Exhibit B
Party Exhibit Cover Sheet

Name of Party		N/A
Does the Party intend to offer evidence?		N/A
Docket entry No. for Party Exhibit List		N/A
Exhibit Identifier	Docket entry No. of Exhibit	Is there a pending request to seal this Exhibit?
N/A	N/A	N/A
Pursuant to Bankruptcy Local Rule 9037-1(a), parties and counsel are solely responsible for redacting the personal identifiers enumerated in Fed. R. Bank. P. 9037(a)		